

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: March 19, 2020

UNITED STATES OF AMERICA

:

-v.-

JEFFERSON MORRILL,

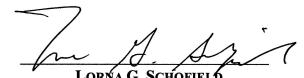
: 1:18-cr-00600-LGS-1
Judge Lorna G. Schofield

: Application Granted. The Clerk of the Court
is directed to terminate the motion at docket
number 35.

Defendant.

: Dated: March 19, 2020
New York, New York

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LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

**UNOPPOSED MOTION OF DEFENDANT JEFFERSON MORRILL
TO MODIFY STANDARD CONDITION OF PROBATION SUPERVISION**

COMES NOW the Defendant, **Jefferson Morrill**, by and through his undersigned counsel, and hereby respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer” to permit Mr. Morrill to travel to: (1) the Chicago Sports Spectacular between the dates of March 12 and March 16, 2020; and, (2) his daughter’s college graduation at American University in Washington, D.C., between the dates of May 9 and May 11, 2020. (Docket Entry 28 at p. 4). In support hereof, Defendant states as follows:

1. On November 12, 2019, this Court sentenced Mr. Morrill to a one-year term of probation as a result of his conviction for trafficking in counterfeit goods, in violation of 18 U.S.C. § 2320. (Docket Entry 28, *Judgment In A Criminal Case*). The judgment contains *Standard Conditions of Supervision*. *Id.* at p.4. Standard Condition No. 3 precludes him from “leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer.” *Id.*

2. Since Mr. Morrill resides in the Middle District of Tennessee, Mr. Morrill's probation supervision was administratively transferred to the U.S. Probation Office for the Middle District of Tennessee. Mr. Morrill is being supervised by MDTN U.S. Probation Officer Montranese Vinson.

3. As disclosed in Mr. Morrill's Presentence Report, Mr. Morrill owns and operates Rochester Sports, an autographed sports memorabilia company, which sells legitimate, legal, signed sports merchandise. Mr. Morrill needs to attend an annual sports memorabilia show in Chicago, Illinois, known as the Chicago Sports Spectacular (chicagosportsspectacular.com), between the dates of March 12 and March 16, 2020. This is another significant memorabilia show in the United States and Mr. Morrill needs to attend in person to meet with vendors and companies to purchase legitimate items upon which real autograph signatures can be affixed and resold.

4. MDTN Probation Officer Vinson has authorized counsel to report that she does not oppose this motion.

5. The Court granted a similar motion on January 9, 2020. (Docket Entry 34). Mr. Morrill traveled without incident. This is the final travel request which will be made on behalf of Mr. Morrill.

6. Assistant United States Attorney Daniel Nessim has authorized undersigned counsel to report that the government has no objection to this motion.

WHEREFORE, based on the foregoing, Defendant Morrill respectfully requests that the Court enter an order modifying Standard Condition of Supervision No. 3 which precludes him from "leav[ing] the federal judicial district where [he is] authorized to reside [Middle District of Tennessee] without first getting permission from the court or the probation officer" to permit Mr. Morrill to travel to: (1) the Chicago Sports Spectacular between the dates of March 12 and March

16, 2020; and, (2) his daughter's college graduation at American University in Washington, D.C., between the dates of May 9 and May 11, 2020.

Respectfully submitted,

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JOSEPH W. FUSON

Attorneys for Defendant Morrill

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been sent via the Court's electronic filing system, if registered, or, if unregistered in the Court's system, it has been sent via facsimile and deposited in the United States Mail, postage prepaid, to:

Daniel G. Nessim
Assistant United States Attorney
The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, NY 10007

VIA EMAIL

Montranese Vinson
U.S. Probation Officer
Middle District of Tennessee
montranese_vinson@tnmp.uscourts.gov

This 9th day of March, 2020.

/s Peter J. Strianse
PETER J. STRIANSE